

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF IREM TUMER

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, Irem Tumer, declare as follows

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to  
3 the information set forth below through personal knowledge as well as through Oregon State  
4 University personnel who have assisted me in gathering this information from our institution.

5 2. I earned my Bachelor of Science and Doctor of Philosophy in Mechanical  
6 Engineering from the University of Texas at Austin.

7 3. I am the Vice President for Research and Innovation at Oregon State University.

8 4. Oregon State University enrolls more than 37,000 students and employs more  
9 than 6,000 individuals on a full-time equivalent basis. It is the land grant university of the State  
10 of Oregon, a Carnegie Classification of Institutions of Higher Education Research I designated  
11 institution, and one of three land, sea, space and sun grant universities in the United States.

12 5. As Vice President for Research and Innovation, I lead all aspects of the research  
13 enterprise for the University.

14 **Familiarity with the Executive Order**

15 6. I am aware that President Trump issued an Executive Order on January 28, 2025  
16 characterizing certain aspects of gender affirming care as “chemical and surgical mutilation” and  
17 directing the heads of federal executive departments and agencies to take immediate steps to  
18 ensure that institutions receiving Federal research or education grants stop providing gender  
19 affirming care to individuals under 19 years of age.

20 7. I am aware that Oregon State University provides medical care through its  
21 Student Health Services that enables students to continue to pursue their education while  
22 undergoing medical treatment, including gender affirming care.

23 8. I am aware that, on February 3, 2025, the White House issued a statement  
24 claiming that certain health institutions, including those that are part of or affiliated with  
25 universities, have stopped or are considering stopping providing gender affirming care to patients  
26



1 under 19 years of age citing the potential loss of Federal research and educational funds as a  
2 result of the Executive Order.

3 9. Without conceding that Oregon State University's Student Health Services is a  
4 "medical institution" as that term is defined under Section 4 of the Executive Order, I think it  
5 likely that the broad language and lack of definitions for key terms will result in relevant agencies  
6 interpreting the language in such a manner, and requiring Oregon State University to choose  
7 between providing needed medical care to its students, and receiving research and education  
8 funding critical to its mission.

9 **Research & Education Grants at Oregon State University**

10 10. Oregon State University houses a robust research program, with internationally  
11 recognized faculty, and its impact reaches throughout the state of Oregon, the nation and the  
12 world to address global challenges.

13 11. Research done at OSU creates knowledge that leads to innovations, commercial  
14 products, and services and supports launch and growth of research-based startups in fields such  
15 as medicine and energy storage.

16 12. In fiscal year 2024 (July 1, 2023-June 30, 2024), OSU received \$371,000,000 in  
17 federal research awards. In the first six months of fiscal year 2025 (beginning July 1, 2024) OSU  
18 has received \$186,746,901 in federal research awards, averaging more than \$31,000,000 per  
19 month from 20 different federal departments and agencies.

20 13. Significant public benefit flows from federally funded research performed at  
21 Oregon State University. Some recent examples include: (1) National Institutes of Health grant  
22 funding to research the use of microfluidics to achieve a personalized-medicine breakthrough  
23 for people with epilepsy; (2) National Eye Institute grant funding that resulted in the  
24 development of a new type of material capable of reaching the lungs and the eyes, which is an  
25 important step forward in genetic therapy for hereditary conditions like cystic fibrosis, and  
26 inherited vision loss; and (3) Research funded by the USDA, the U.S. Army Medical Research

1 and Material Command, and the National Cancer Institute that discovered a novel way to make  
2 breast cancer cells die.

3 14. Federal awards are the driving force behind Oregon State University's success in  
4 advancing research of utmost importance to the state of Oregon, the nation, and the world, and  
5 to attracting and developing excellent faculty and students that make the work possible. Even a  
6 temporary pause on the issuance of new awards and on the disbursement of federal funds for  
7 open awards would have broad impacts on the work of the university

8 15. If the federal government were to stop providing research and education grants  
9 to Oregon State University, the impacts would be devastating to its operations and disrupt critical  
10 research in areas such as integrated health and biotechnology, robotics, agriculture, food and  
11 beverages, semiconductors and artificial intelligence.

12 16. I am not aware of Oregon State University having ever received federal grant  
13 funding contingent upon it not providing a particular type of medical treatment or medical care  
14 through its Student Health Services.

15 I declare under penalty of perjury under the laws of the Oregon and the United States of  
16 America that the foregoing is true and correct.

17 DATED this 5th day of February 2025, at Barcelona, Spain.

18  
19 DocuSigned by:  
Irem Tumer  
20 IREM TUMER 266BD680B5B84CA...  
21 Vice President for Research and Innovation  
22 Oregon State University  
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